

March 15, 2017

VIA ECF

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Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Marasco v. American Expediting Company, Inc., et al.*
Case No. 16-cv-232 (PKC)(JO)

Dear Judge Chen:

As the Court is aware, we represent Defendants A to Z Logistics, Inc. ("A to Z") and Victor Finnegan ("Finnegan") (collectively, the "Defendants") in the above-referenced matter.

On February 27, 2017, we submitted a pre-motion letter to the Court regarding our anticipated motion to dismiss the claims alleged against Defendant Finnegan in connection with his alleged role as president of A to Z. (Docket No. 49). Plaintiff subsequently submitted a response to same. (Docket No. 50). On March 7, 2017, Your Honor directed the parties to submit a proposed briefing schedule with respect to Defendant Finnegan's anticipated motion.

Accordingly, we write to propose the following briefing schedule: (1) Defendant Finnegan to serve moving papers on or before April 11, 2017; (2) Plaintiff to serve opposition papers on or before April 25, 2017; and (3) Defendant Finnegan to serve reply papers on or before May 9, 2017. Plaintiff's counsel consents to this proposed schedule.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ *Leslie M. DiBenedetto*

Leslie M. DiBenedetto

cc: All counsel of record (via ECF)